

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

Cynthia Ann Schmidt  
Woodrow Paul Schmidt JR  
Debtor(s)

Lakeview Loan Servicing, LLC  
Movant

V.

Cynthia Ann Schmidt  
Woodrow Paul Schmidt JR  
Respondent(s)

Charles J. Dehart, III  
Trustee/Respondent

Chapter 13

1:17-bk-01806-HWV

Answer

**ANSWER**

**AND NOW**, this 8th day of December 2019, the Debtors, Cynthia Ann Schmidt and Woodrow Paul Schmidt JR, by and through counsel, Dawn M. Cutaia, file this Answer to the Motion for Relief from Stay filed by Lakeview Loan Servicing, LLC:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted. By way of further answer, Debtors suffered some unexpected expenses that caused them to fall behind but they are taking an emergency withdrawal from their 401(k) and will be able to pay the entire post-petition

balance once they obtain those funds. Debtors have already requested the funds.

8. Admitted.

9. Admitted.

**WHEREFORE**, the Debtor respectfully requests this Honorable Court deny the Motion for Relief to allow Debtors an opportunity to cure the arrears.

Respectfully Submitted,  
By: **/s/ Dawn M. Cutaia**  
Supreme Court ID 77965  
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